

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

THE TRIAL LAWYERS COLLEGE, a nonprofit
corporation,

Plaintiff.

vs.

GERRY SPENCE TRIAL INSTITUTE, a
nonprofit corporation and GERALD L. SPENCE,
JOHN ZELBST, REX PARRIS, JOSEPH H.
LOW, KENT SPENCE, JOHN JOYCE, and
DANIEL AMBROSE, individuals, GERRY
SPENCE METHOD AT THUNDERHEAD
RANCH, INC.,

Defendants.

Civil Action No. 1:20-CV-00080-JMC

**SUPPLEMENTAL DECLARATION OF BETH J. KUSHNER IN SUPPORT OF
DEFENDANTS' REPLY MOTION FOR CONTEMPT**

I, Beth J. Kushner, am over 18 years of age, and I am competent to testify in this proceeding. I give this Declaration based on my own personal knowledge.

1. I am counsel of record for defendants Gerry Spence Trial Institute (f/k/a Gerry Spence Trial Lawyers College at Thunderhead Ranch), Gerald L. Spence, John Zelbst, Rex Parris, Joseph H. Low, and Kent Spence (collectively “the Spence Defendants”).

2. Attached as **Exhibit A** is a true and correct copy of relevant portions of the Complaint filed by Gerry Spence in California state court, which was resolved as part of a global settlement.

3. Attached as **Exhibit B** is a true and correct copy of the biography on TLC’s website of its instructor, Ashley Parris. Ms. Parris is Defendant Rex Parris’ daughter.

4. In TLC's opposition to this Motion, TLC stated that it had tried for two years to address certain issues related to settlement and was "rebuffed." There is no declaration supporting that statement and it is false.

5. Attached as **Exhibit C** are true and correct copies of my correspondence with TLC counsel Chris Ralston after Dkt. 598 was filed. I continued to hope we could resolve this dispute. As was the case with the prior correspondence, Mr. Ralston did not acknowledge receipt or in any way respond.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated this 5th day of December 2024.



Beth J. Kushner